

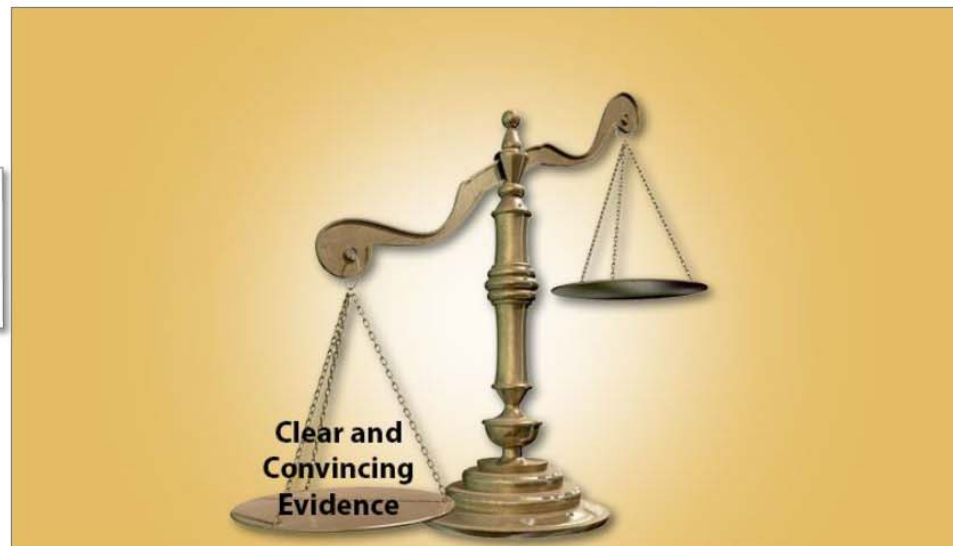
Exhibit A

PDX 602

Understanding Nikon's Burden to Prove Invalidity



§ 282. Presumption of validity; defenses
A patent shall be presumed valid.




PDX-602


PDX 605

Toyofuku: Missing Elements of Claim 14

14. A method for providing error information to a user of a digital camera having a built-in display, comprising the steps of:

processing a user execution of an erroneous operation performed by the user of the digital camera; and displaying a textual dialog containing operational error information and method of correct operation information that is correlated with said erroneous operation executed by the user of the digital camera.

 “User execution of an erroneous operation” or “operational error information”

 “Method of correct operation information that is correlated with said erroneous operation”

 “Displaying textual dialog”

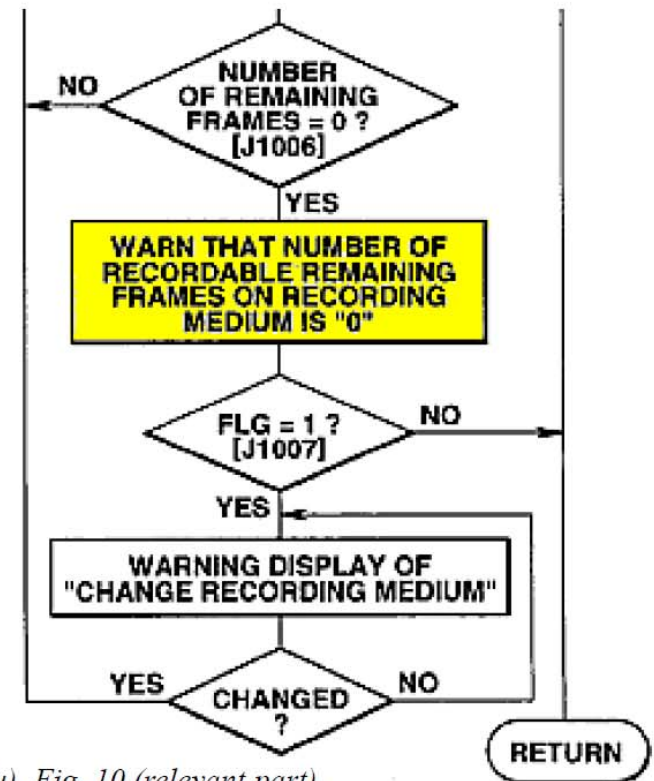
PDX 608

No “displaying a textual dialog”



Toyofuku does not disclose “displaying a textual dialog containing operational error information”

- Toyofuku does not describe how the warning regarding zero frames is provided



JTX-1486 (Toyofuku), Fig. 10 (relevant part)

PDX 625

“Design-Around” Proposed by Nikon Is Not a Design-Around

- Remove part of the message:
 - “~~Unable to create panorama.~~ Pan the camera more slowly.”
- Not a design-around
- With flashing and static arrows would still convey an error message

PDX 627

'167 "Alternatives" Proposed by Nikon

- Nikon proposed:
 - Apple Live Photos
 - But Apple technology is not available to Nikon
 - Requiring that “a separate button be pressed to start video capture”:
 - Unclear what this means. If referring to user manually coordinating capture of sensory data:
 - Would remove the benefit of invention
 - Would return the product to cumbersome prior art
- No acceptable non-infringing alternatives exist

PDX 628

HP Cameras Do Not Practice the '792 Patent

PDX 629

The HP Cameras Do Not Practice the '792 Patent

- Allegedly Practicing Products -- discontinued HP cameras
 - d3500
 - p550
 - p650
 - s510
 - CA340

PDX 630

The HP Cameras Do Not Practice Any Claims of the '792 Patent

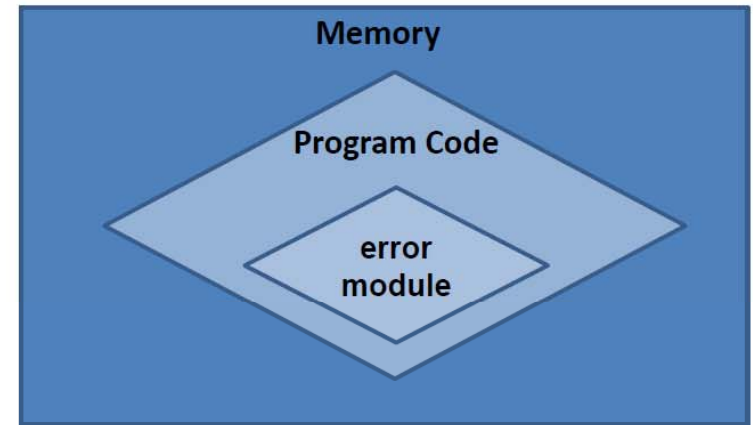
- The '792 patent has independent claims 1, 6, 14, 19, 23, 27, and 28
- Can be grouped as:
 - 1
 - 6
 - 14, 19, 23, 27, and 28
- Nikon provided analysis only for claims 1 and 28

PDX 631

HP Cameras Do Not Practice Claim 1


1. A digital camera, comprising:
a photoelement array for acquiring image data;
a memory for saving said image data;
a processor in communication with said memory;
a display in communication with said processor for exhibiting said image data; and
program code stored in said memory and executed by said processor for manipulating said image data, said program code comprising an error utility software module for providing a user with information on incorrectly operating said digital camera.

- No evidence HP cameras have hierarchical arrangement of “error utility software module” within “program code”
- No evidence HP cameras have an error utility software “module”



PDX 632

HP Cameras Do Not Practice Claim 6




6. A digital camera, comprising:
capturing means for acquiring image data;
storage means for saving said image data;
processing means in communication with said storage means;
display means in communication with said processing means for exhibiting said image data; and
program means stored in said storage means and executed by said processing means for manipulating said image data, said program means comprising an error utility software module for providing a user with information on incorrectly and correctly operating said digital camera.

- No evidence of hierarchical arrangement of “error utility software module” within “program code”
- No evidence of providing information on incorrect operation
- No evidence of providing information on correct operation

PDX 633

Claims 14, 19, 23, 27, 28

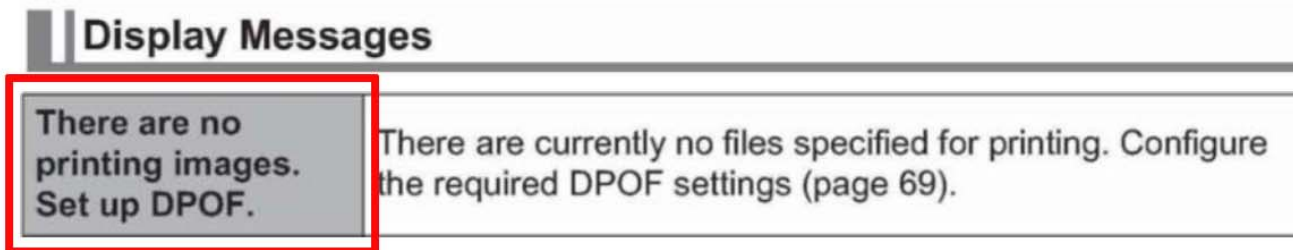
28. A digital camera, comprising:
processing means for processing a user execution of an
erroneous operation of the digital camera; and
display means for displaying a textual dialog containing
operational error information and **method of correct
operation information that is correlated with an erro-
neous operation** executed by a user of the digital
camera.

Claims 14, 19,
23, 27, and 28
require
“operational error
information and
method of
correct operation
information that
is correlated with
said erroneous
operation”

PDX 634

HP Cameras Do Not Practice Claims 14, 19, 23, 27, 28

- No HP camera displays a textual dialog containing:
 - operational error information and/or
 - method of correct operation information correlated with an erroneous operation
- Message relied on by Mr. Goodin:



JTX-1603 (p3500 Digital Camera User Manual) at p. 108

- “There are no printing images” is not user error
- No error → no method of correct operation information correlated with an erroneous operation

PDX 635

HP Tablets Do Not Practice the '167 Patent

PDX 636

The HP Tablets Do Not Practice the '167 Patent

- Allegedly Practicing Products -- discontinued HP tablet

– Series 10 Tablets



PDX 637

The HP Tablet Does Not Practice Any Claims of the '167 Patent

Independent claims 1, 14, and 15 are closely related

1. A method of operating a digital camera, comprising:
placing the camera into a wait state in response to powering-up the camera;
detecting manipulation of the camera prior to image-capture;
wherein the detecting manipulation is performed while the camera is in the wait state and comprises sensing focus adjustments by the camera and sensing activation of a viewfinder display of the digital camera;
generating sensory data from a sensor signal responsive to detecting manipulation of the camera;
storing the sensory data in temporary storage;
generating still image data in response to a control signal to capture a still image, and storing the still image data in non-volatile storage;
selecting a subset of the sensory data from the temporary storage; and
storing the subset of the sensory data in non-volatile storage in association with the still image data.

14. A digital camera, comprising:
means for detecting manipulation of the camera prior to image-capture
wherein the means for detecting includes means for sensing focus adjustments by the camera while the camera is powered-up and in a wait state, for sensing activation of a viewfinder display of the digital camera and for generating the trigger signal in response to detection of a focus adjustment;
means for generating sensory data from a sensor signal responsive to detecting manipulation of the camera;
means for storing the sensory data in temporary storage;
means for generating still image data in response to a control signal to capture a still image, and storing the still image data in non-volatile storage;
means for selecting a subset of the sensory data from the temporary storage; and
means for storing the subset of the sensory data in non-volatile storage in association with the still image data.

15. A digital camera, comprising:
a processing unit;
a detection circuit coupled to the processing unit, the detection circuit configured to generate a trigger signal when the camera is manipulated prior to image-capture; wherein the detection circuit is configured to sense focus adjustments by the camera while the camera is powered-up and in a wait state, sense activation of a viewfinder display of the digital camera, and generate the trigger signal in response to detection of a focus adjustment;
a memory arrangement coupled to the processing unit;
an image-capture circuit arrangement coupled to the processing unit and configured to capture still image data in response to user control actions;
a sensory-data-capture circuit arrangement coupled to the processing unit and configured to capture sensory data; and
wherein the processing unit is configured to initiate capture of sensory data responsive to the trigger signal, temporarily store the sensory data, select a subset of the sensory data, and retentively store the subset of the sensory data in association with the still image data.

PDX 638

The HP Tablet Does Not Practice The '167 Claims

- Missing elements:
 - 1) “digital camera”
 - 2) sensing activation of viewfinder display. Display is activated:
 - a) before the user enters camera app
 - b) before “detection circuit” can “sense activation”
 - 3) trigger signal/sensor signal:
 - a) No trigger signal/sensor signal identified
 - b) No source code analysis by Nikon

